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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 KELLY SERVICES, INC. ,

10 Plaintiff,

11 v.

12 A2Z GLOBAL STAFFING INC., ALEXIS J.  
13 OKEEFE, ALLAN J. OKEEFE, SUSAN M.  
14 OKEEFE and DAVEN RICKETTS ,

15 Defendants.

CASE NO.: 2:15-cv-01443-JAD-PAL

**STIPULATION TO CORRECT  
CLERICAL ERROR IN JOINT  
DISCOVERY PLAN AND SCHEDULING  
ORDER (DOC. 18)**

**Submitted in Compliance with LR 26-1(e)**

16 Plaintiff KELLY SERVICES, INC., by and through its counsel of record SHERI THOME,  
17 ESQ., and TYSON E. HAFEN, ESQ., and Defendant ALLAN J. O'KEEFE, hereby stipulate to  
18 correct a clerical error in the joint discovery plan and scheduling order. Specifically, the parties  
19 recently noticed that some of the dates provided in the joint discovery plan were mistakenly different  
20 than the dates provided in the proposed scheduling order (Doc. 16) which was signed by the  
21 Magistrate and filed on November 16, 2015 (Doc. 18). Specifically, the proposed discovery plan  
22 correctly had the following FRCP 26(a)(2) disclosures (experts) dates:

23 1/9/16 – Initial

24 2/18/16 – Rebuttal

25 Whereas, the actual proposed order signed by the Magistrate incorrectly had the following  
26 incorrect dates for these same events:

27 3/5/15 – Initial

28 1/9/16 – Rebuttal

1 In order to resolve any confusion as to the actual deadlines, and pursuant to the Court's  
2 instruction, the parties submit this stipulation clarifying the intended discovery dates as follows [as  
3 previously identified in (Doc. 16) the joint discovery plan (**clarified discovery dates in bold**)]:

- 4 1. The close of discovery shall be March 9, 2016.
- 5 2. Amending the Pleadings and Adding Parties: The last date for filing motions to amend the  
6 pleadings or to add parties shall not be later than 90 days prior to the close of discovery. In  
7 this action, the last date for filing motions to amend the pleading or add parties shall be  
8 December 10, 2015.
- 9 3. FRCP 26(a)(2) Initial Expert Disclosures: The last day for disclosure of expert witnesses  
10 shall be 60 days before the discovery cut-off date. In this action, the last date for expert  
11 disclosures shall be **January 9, 2016**.
- 12 4. FRCP 26(a)(2) Rebuttal Expert Disclosures: The rebuttal expert disclosure date shall be 30  
13 days after the initial expert disclosure deadline. In this action, the last date for rebuttal expert  
14 disclosures shall be **February 18, 2016**.
- 15 5. Dispositive Motions: The last date for filing dispositive motions shall not be later than 30  
16 days after the discovery cut-off date. In this action, the last date for filing dispositive  
17 motions shall be April 8, 2016.
- 18 6. Pretrial Order: The joint pretrial order shall be filed no later than 30 days after the date set  
19 for filing dispositive motions. In this action, the joint pretrial order shall be filed on or before  
20 May 9, 2016. In the event dispositive motions are filed, the date for filing the joint pretrial  
21 order shall be suspended until thirty (30) days after decision of the dispositive motions or  
22 further order of the Court.
- 23 7. FRCP 26(a) disclosures: The disclosures required by FRCP 26(a)(3) and any objection  
24 thereto shall be included in the pretrial order.
- 25 8. Interim Status Report: In compliance with LR 26-3, the parties will file an interim status  
26 report on or before January 9, 2016, which will include: (a) an estimated time for trial; (b)  
27 three alternative trial dates; and (c) whether trial counsel believes trial could be eliminated or  
28 if its length could be impacted by substantive motions.

1 Notably, pursuant to instruction from the Court, this stipulation is being submitted without a  
2 proposed order, as the Magistrate already signed the scheduling order (Doc. 18) which had the  
3 previously discussed incorrect dates due to clerical error.

4 **APPROVED AS TO FORM AND CONTENT**

5 DATED this 8th day of December, 2015.

DATED this 8th day of December, 2015.

6  
7 WILSON ELSEER MOSKOWITZ EDELMAN &  
8 DICKER LLP

9 /s/ Tyson E. Hafen

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Allan OKeefe  
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Apopka FL 32712  
***Defendant***

15 IT IS SO ORDERED this 9th day  
16 of December, 2015.

17   
18 Peggy A. Leen  
19 United States Magistrate Judge  
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